

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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7 WEST 57TH STREET REALTY COMPANY, LLC, a
Delaware Limited Liability Company,

Plaintiff,

-vs.-

CITIGROUP, INC., CITIBANK, N.A., BANK OF
AMERICA CORP., BANK OF AMERICA, N.A.,
BARCLAYS BANK PLC, UBS AG, JPMORGAN
CHASE & CO., JPMORGAN CHASE BANK,
NATIONAL ASSOCIATION, CREDIT SUISSE GROUP
AG, BANK OF TOKYO MITSUBISHI UFJ LTD.,
COÖPERATIVE CENTRALE RAIFFEISEN
BOERENLEENBANK B.A., HSBC HOLDINGS PLC,
HSBC BANK PLC, HBOS PLC, LLOYDS BANKING
GROUP PLC, ROYAL BANK OF CANADA, THE
NORINCHUKIN BANK, ROYAL BANK OF
SCOTLAND GROUP, PLC, WESTLB AG,
WESTDEUTSCHE IMMOBILIENBANK AG, and
DEUTSCHE BANK AG,

Defendants.
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No. 13-cv-00981

Hon. Paul G. Gardephe

ECF Case

**DECLARATION OF OSAMU TAKASHIMA IN SUPPORT OF
THE NORINCHUKIN BANK'S MOTION TO DISMISS
PLAINTIFF'S ACTION FOR LACK OF PERSONAL JURISDICTION**

I, OSAMU TAKASHIMA, declare the following:

1. I am currently a General Manager in the Legal Division of The Norinchukin Bank ("Norinchukin") and submit this declaration in support of Norinchukin's motion to dismiss the above-captioned action for lack of personal jurisdiction. The facts stated herein are true to the best of my knowledge based on records maintained by Norinchukin in its regular course of business. Unless otherwise noted, the facts set forth in this declaration describe Norinchukin's business during the time period from January 1, 2006 through February 13, 2013.

2. Norinchukin is a Japanese financial institution that was incorporated under the laws of Japan.

3. Norinchukin's headquarters was and is located at 1-13-2, Yurakucho, Chiyoda-ku, Tokyo 100-8420, Japan.

4. Norinchukin had only one branch office in the United States. That branch was licensed and located in New York, New York (the "New York Branch"). There are no Norinchukin offices in any other state.

5. Norinchukin was a panel bank on the Dollar LIBOR panel that was administered by the British Bankers' Association (the "BBA").

6. All Norinchukin employees and supervisors responsible for submitting Dollar LIBOR rates to the BBA worked in England. The New York Branch did not contribute to submitting Dollar LIBOR rates.

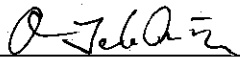
7. All witnesses and documents potentially relevant to the plaintiffs' allegations were located in England or Japan.

8. For each of the fiscal years ended March 31, 2011, 2012, 2013 and 2014, less than 0.6% of Norinchukin's worldwide income came from its New York Branch operations.

9. Throughout that same period, Norinchukin's New York Branch had fewer than 70 employees out of more than 3,100 Norinchukin employees worldwide.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 14th day of November, 2014 in Tokyo, Japan.



Osamu Takashima